



THE LAW OFFICE OF
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February 5, 2021

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (ORC-1)
San Francisco, California 94105

Submitted via U.S. mail

Re: Public Records Act Request

To Whom It May Concern:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*, I request files that are received, kept or maintained by the United States Environmental Protection Agency, Region 9 (“Region 9”) that relate to the following:

1. Any/all “60 Day Notice Letters” filed with Region 9 by California River Watch, a California 501(c)(3) non-profit corporation, between July 1, 2020 and the present. These are letters filed under Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), which require that sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), a citizen must give notice of his/her intention to file suit;
2. Any/all “60 Day Notice Letters” filed with Region 9 by the law firm of Brodsky & Smith, LLC between July 1, 2020 and the present;
3. Settlement agreements, consent decrees, or administrative orders on consent that include, but are not necessarily limited to the parties Region 9 and California River Watch that were finalized between July 1, 2020 and the present; and
4. Settlement agreements, consent decrees, or administrative orders on consent that include but are not necessarily limited to the parties Region 9 and Brodsky & Smith, LLC that were finalized between July 1, 2020 and the present.

These may include documents where Region 9 was included on a service list, documents that were filed directly with Region 9, or where Region 9 was given notice via a courtesy copy. Any reference in this request to Region 9 includes, but is not limited to, consultants, employees, officers, and attorneys and any other person or entity contracted to business on its behalf.

If any documents are available in electronic format, or on the internet, we request electronic copies or citations to the internet web address where the document(s) can be located.

If no records are found, please (1) describe the search procedure, including information about the files that were searched, (2) identify the person or persons who conducted the search, and (3) explain why a more comprehensive search of your offices would be unreasonable.

If you require any information to facilitate this request, please do not hesitate to contact our office. Thank you very much for your assistance in this matter.

Regards,

/s/

Megan S. Meadows, Esq.